

## **Exhibit M**

**Nicholas Vaughan**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

SUZZANNE ANDERSON, et al.,

**AFFIDAVIT OF  
NICHOLAS VAUGHAN**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK     )  
                                  : SS.:  
COUNTY OF BRONX     )

NICHOLAS VAUGHAN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 30D Carroll Street, Bronx, New York 10464.
2. I am currently 34 years old, having been born on February 5, 1988.
3. I am the son of Stephen Vaughan, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. On February 23, 2016, my father died from metastatic tongue cancer at the age of 58. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. I grew up as an only child, and my father was my best friend. I looked up to him and admired my father greatly. He coached me in baseball, basketball, and football. When I was older, my dad used to take me to Yankees games, and we'd take his boat out on the sound. I viewed my dad as a role model and my idol. My father's relationship with my mother was the type of relationship that I hope to have one day. My dad was the textbook model father figure. I

could never have asked for anything better. Since my father was a skilled carpenter and I would see the amazing things he could do, it inspired me to follow in his footsteps. About one year before my father became ill, I was accepted into the Carpenters union. This really exacerbated the extent of my loss because I feel like my father was supposed to be here to teach me the carpentry trade and never really had the chance to do that on a professional level.

6. My father was assigned to work in the World Trade Center area after September 11, 2001. At the time of 9/11, I was only 13 years old and lived at my parents' home. Sometime soon after the towers fell, my father received a call to go down and begin work. Since he was a carpenter for the City, he was building ramps for the Department of Environmental Protection so they could install equipment to test the air quality. It is depressing to think that my father became sick as a result of just doing his job. He was down there for a couple of months. I remember being at the house and seeing my father return home from work full of soot and dust from the site. More and more each day when he came home from work, he seemed sullen and depressed. He obviously was seeing things that greatly affected him. Even though my dad didn't want to talk about 9/11 much, you could tell that something wasn't right.

7. Even when my father wasn't feeling well, he was never much of a complainer. On several occasions when I was with my dad, I could see he had substantial trouble breathing. When he was sleeping, he made really loud noises, so it was clear that my dad wasn't getting enough air as he slept. After a really bad sore throat, my mother and I took him to an Ear, Nose, and Throat specialist. They performed several invasive tests and went down his throat. Once the doctor identified a tumor, we were told that my dad needed to have an MRI as soon as possible to determine the extent of the damage. From there, my father went to Sloan Kettering. The cancer started in his tongue and eventually spread to his lymph nodes, brain, and everywhere else.

8. After being examined at Sloan Kettering, my dad was also placed on an experimental drug. The doctors only gave him another year to live, but he held on for a few more years. Sadly, most of those years were filled with activities related to my father's care. My mom and I took him to many appointments at Sloan Kettering. I also helped clean my father's trach and replace the tube in his neck. Throughout that time, I helped out with doctor's appointments, chemotherapy appointments, and anything else I could do to make it a little easier on my parents.



It felt like an emergency situation that lasted for years. As my father's illness progressed, we had to install a hospital bed in our home, which my mother placed in the living room to make things easier for my dad. Our living room, which was always the center of family gatherings and happy times, was effectively transformed into a hospital room.

9. My father's cancer and ultimate passing away was the most traumatic thing that I have ever experienced. I took it pretty hard. I became really depressed and had to start taking medication. Everything hit me all at once. It was hard on me personally, but my mother had a particularly rough time. That hurt me to my soul. I didn't know what to do. I felt helpless. I struggled with drugs and alcohol. Seeing my father in the hospital or sitting in a bed in our living room made me fall deep into a depression. The worst was when my father was terminally ill and there was a cloud hanging over our daily lives. I kept thinking, "when is he going to die?" and "when is this all going to end?" It was awful. Unfortunately, the only way that I knew how to deal with it was through substance abuse, which just led to a big mess for me. I'm sober now and have been sober for two years. But I'm still struggling with anxiety and depression. I'm grateful that I was able to overcome my substance abuse issues. Therapy for my grief and inpatient programs definitely helped. I try to pay my experience forward by speaking at rehab centers on a regular basis and help provide some encouragement to others who have suffered a similar type of loss or traumatic experience. I think he'd be proud of that.

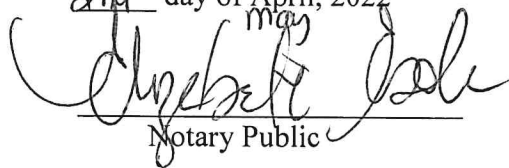
10. My father's cancer had an impact on me emotionally and financially as well. As a direct result of the immense grief I felt from my father's loss, I spiraled into a depressive state and looked to drugs and alcohol as a means of self-medicating. In turn, this led to my being kicked out of the union due to the excessive drinking and drug abuse. I lost a number of jobs because of it. Eventually, once I got my life back together, I was able to rejoin the union, but even that was difficult. I really couldn't be my normal self, and it affected my life for a good four or five years after my father passed away.

11. Preparing this affidavit brings up a lot of painful memories and feelings. My father was a good man who was doing his job and working hard, as always, to provide for his family. This is a great personal loss because my father should have been here for love and guidance. He should be here to see how I overcame demons and it made me stronger. He should be here to see me get married and have kids someday. I was only 28 years old when my father

passed away. You're really not supposed to bury your father in your 20s. My father was the rock of my whole family and now that he's gone things will never be the same again.

  
NICHOLAS VAUGHAN

Sworn to before me this  
2nd day of ~~April~~ <sup>May</sup>, 2022

  
Notary Public

ELIZABETH ESOLA  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 01ES5049826  
Qualified in Bronx County  
My Commission Expires 09-25-2025

**John Rakis**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
SUZANNE ANDERSON, et al.,

**AFFIDAVIT OF  
JOHN RAKIS**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                              : SS.:  
COUNTY OF KINGS     )

JOHN RAKIS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 215 Adams Street, Apt. 5J, Brooklyn, New York 11201.

2. I am currently 69 years old, having been born on August 10, 1952.

3. I am the husband of Freddie Wallace-Rakis, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. On January 3, 2013, my wife, Freddie Wallace-Rakis, died from leukemia at the age of 67. It was medically determined that Freddie's leukemia was causally connected to her exposure to toxins resulting from the September 11, 2001 terrorist attacks.

5. Freddie and I met in 1978 and lived together until we were married in 1988. I loved her very much. Together, we did virtually everything and traveled extensively. We vacationed in Europe and visited many national parks, including Yosemite, Bryce National Park, Zion, and the Smoky Mountains. We both enjoyed hiking and the outdoors. One of the most beautiful things about our relationship is how well we connected with each other's family. Since I had extended family in California, we often took trips out west and would stay with them.

6. I met Freddie when we were both working for the Department of Corrections. After I left that job to advance my career in the nonprofit sector, my wife was kind enough to let me study for a year at Harvard. She always encouraged me to pursue my dream. While it was difficult to be separated for so long, I'm glad that Freddie took many trips up to Cambridge to visit me. When I returned from Harvard, I managed a nonprofit organization and later became a nonprofit consultant. Freddie always had my back. I believe that helped us maintain such an enduring relationship. Freddie was an unusual person and my first true love. When Freddie passed away, our friends and colleagues from all over the country flew in for her funeral. Remarkably, a friend of ours from Ireland commented that Freddie had a "1000-watt smile that would light up the room every time she walked in."

7. Freddie was the Director of Volunteerism for the New York City Department of Corrections. On 9/11, she worked on Hudson Street, immediately north of the World Trade Center. I thanked God that she was able to get home safely. Like so many people, Freddie was told it was safe to return to work down there. She never questioned it, she just returned to work. I am certain my wife's leukemia was caused by her continued exposure to the toxic air she took in each day.

8. Freddie loved Christmas. Just before Christmas 2012, she hadn't been feeling well and said she wasn't up to having Christmas at our apartment. On December 27, Freddie had a fever, and I took her to the emergency room at Long Island College Hospital. A blood test revealed an extremely high white blood cell count. After more testing to confirm the results, the doctor told me something was very wrong and that she might have a bad infection. A few days later, he confirmed my worst nightmare—Freddie had leukemia. Within one week, on January 3, 2013, Freddie passed away. I was numb. It happened so fast. I didn't know how I was going to go on without her.

9. After Freddie's diagnosis, I wanted to have her moved to Memorial Sloan Kettering. Despite my pleas to the doctor, he told me that her condition would not allow her to be moved there in the time needed. The doctor proposed a treatment to wash out her blood, but Freddie's blood pressure dropped dramatically and that was no longer an option. On New Year's Day, Freddie managed to call me from the hospital, and I coordinated a conference call with her mother. She seemed happy to speak with her mother, but only had enough strength to talk for



five minutes. The evening of January 2, 2013, I received a call from the hospital telling me that I should come. When I arrived at the hospital, I was informed that Freddie was having trouble breathing and that her blood pressure continued to drop. They told me she was unconscious and that there was nothing more they could do for her. As I got to her room, the situation became dire, and I was chased out of her room. At that point, they had to place her on life support. Since she died the next day, I felt robbed of the chance to say goodbye.

10. What happened to Freddie was extraordinarily painful for me. My wife had a pretty encouraging attitude when this first hit us. She said she'd deal with it, get chemotherapy, and do whatever was necessary to fight it. We had no idea her condition would deteriorate so quickly. I became so fearful that I would lose her. I also worried about Freddie's mom and everything that would be needed to take care of her. I called all of our friends and relatives to let them know about Freddie's condition. With each and every conversation, thoughts were racing through my mind of all the implications of losing the love of my life. I don't think I slept at all the week that Freddie was in the hospital. Usually, Christmas is a happy time in our home and suddenly everything became uncertain. It's frustrating that she never even had a chance to fight the leukemia. It seems like we were told, and she was gone in an instant. Despite my best efforts to identify the most effective plan of care, Freddie's illness had already progressed so quickly that I never even had the chance to become more involved in her care.

11. After my wife passed away, I went to my doctor, and she prescribed antidepressants for me. I am usually a pretty even-tempered person, but all of a sudden, I became argumentative. I was so frustrated and had no patience. I didn't know how to release the anger I felt in having lost my beautiful wife with very little warning. It was stressful to deal with taking care of my mother-in-law, arranging the funeral, and ultimately, getting on with my life and going back to work.

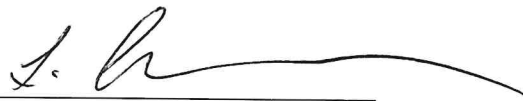
12. Since Freddie was planning to retire just a month after she passed away, she would have been entitled to a pension of roughly \$50,000 per year. However, because she died before she could put in the pension paperwork, I was entitled to a one-time payout, which I split with my mother-in-law. There was also an impact because the pension would have covered medical insurance. Now, I need to make payments on a monthly basis under Medicare. The loss of Freddie's pension was probably the greatest financial impact that resulted from her passing

because it was supposed to be such a crucial part of our retirement plans.

13. When Freddie passed away, I had the physical feeling as if a horse had kicked me in the chest. It was like a thunderclap of pain that just went in and stayed for a while. I had never experienced that feeling before with the loss of a loved one. I was sad all time and cried a lot. In many ways, I credit Freddie's mother, who had great wisdom, for helping me to calm down. Between help from Freddie's mother, a strong support network of family and friends, as well as counseling, I was eventually able to find my way back to some sense of sanity.

  
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JOHN RAKIS

Sworn to before me this  
27<sup>th</sup> day of April, 2022

  
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Notary Public

Tanesia Franklin  
Notary Public, State of New York  
Reg. No. 01FR6427874  
Qualified in Kings County  
Commission Expires 1/03/2026



**Christopher Walsh**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
SUZZANNE ANDERSON, et al,

Plaintiffs,

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                              : SS.:  
COUNTY OF RICHMOND    )

**AFFIDAVIT OF  
RICHARD WALSH on behalf of  
CHRISTOPHER WALSH**

20-CV-00354 (GBD)(SN)

RICHARD WALSH, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 53 Bertha Place, Staten Island, New York 10301.
2. I am the husband and estate representative of decedent, Elizabeth Ann Walsh.
3. My son, Christopher Walsh, is also a plaintiff in the within action, is over 18 years of age, and resides at 53 Bertha Place, Staten Island, New York 10301. Due to Christopher's developmental disabilities, I submit this Affidavit on his behalf.
4. Christopher is currently 36 years old, having been born on November 5, 1985.
5. Christopher is the son of Elizabeth Ann Walsh, upon whose death his claim is based, and submits this Affidavit in connection with the pending motion for a default judgment and in support of his solatium claim.

6. Elizabeth passed away from breast cancer on May 4, 2015, at the age of 57. It has been medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

7. On 9/11, Elizabeth was working as a nurse at Gardens Nursing Home in Brooklyn. As soon as she heard a radio call for volunteers, she went to the World Trade Center site. She stayed for a few hours, during which time she was exposed to the toxic dust and debris.

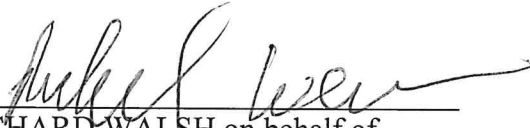
8. In 2008, Elizabeth found a lump in her breast which was diagnosed as breast cancer. She learned the cancer had spread to about 40 lymph nodes in her arm and chest. She had to have a double mastectomy. Elizabeth went through years of chemotherapy treatments. She went into remission for a few years, but the cancer came back with a vengeance and had spread to her bones.

9. Christopher suffers from autism and seizure disorder. He is virtually non-verbal and shows very little emotion. He needs around-the-clock care by at least one adult.

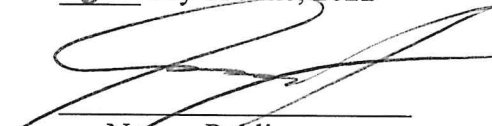
10. My wife and I have five kids, but she was inseparable from Christopher. Making sure he was okay was always her first priority. When he turned two, my wife quit her job to take care of Christopher, full-time. She stayed home with him for the next ten years. She got him walking. She got him to say about 20 words. He's a sweet boy. He never has tantrums or is violent. Whatever emotion he does show, it is always loving. He can recognize people and remembers them. If he likes you, he will smack his lips and make a kissing sound. He can say "hi" and "bye" and recognizes all of his siblings.

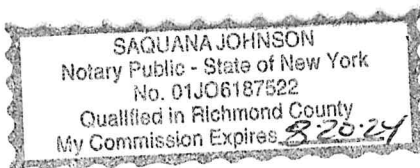
11. Unfortunately, Christopher will never be able to communicate his thoughts or feelings to us. But, when my wife got sick, he knew something was wrong. We noticed one huge change. He never called out for us before. Christopher had never said "mom" or "dad." But when

Elizabeth got sick, he said, “dad” for the first time. That was a huge change, thinking about it now. My wife said, “This is unbelievable. He’s actually asking for help. He needs you.” Christopher never said “mom.” Maybe it was because she was never too far away from him. The more her cancer progressed, however, the less time she was able to spend with him. He was absolutely aware of her absence. I’ll never be sure exactly why he started calling for me and not her. But I believe he knew she was sick. He has her picture near him, and he’ll stare at it, which tells me that he misses her terribly.

  
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RICHARD WALSH on behalf of  
CHRISTOPHER WALSH

Sworn to before me this  
6<sup>th</sup> day of June, 2022

  
\_\_\_\_\_  
Notary Public



**Daniel Patrick Walsh**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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SUZANNE ANDERSON, et al.,

**AFFIDAVIT OF**  
**DANIEL PATRICK WALSH**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW JERSEY     )  
                                      : SS.:  
COUNTY OF BERGEN     )

DANIEL PATRICK WALSH, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 55 Lafayette Avenue, Hillsdale, New Jersey 07642.

2. I am currently 30 years old, having been born on September 23, 1991.

3. I am the son of Elizabeth Ann Walsh, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. On May 4, 2015, my mother passed away from breast cancer at the age of 57. It was determined by the World Trade Center Health Program that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My mother was my go-to person for anything and everything for which I needed advice. During the last few years of her life, I was actually living in my childhood home in Staten Island, and I remember even then that she was the rock in my life. My mom was truly a baseline for support, and on many occasions when life became really hard, I was always grateful to have my mom in my corner. I had a very close relationship with my mom, and, as a young



adult in my early 20s, in the years before she was diagnosed, I would look to my mom for guidance on anything ranging from personal finance to relationship issues. When I was in school, my mom was instrumental in making sure I would perform as best I could academically and later, upon starting my career in Information Technology, my mom was a tremendous source of encouragement. My mom was truly my go-to resource for any questions I had in life.

6. On September 11, 2001, I was only nine years old. Despite my youth, I remember clearly that my mom, a nurse, was a first responder and worked at the World Trade Center site in the aftermath of the attacks. I remember that she was not home as often during that period because she was so dedicated to her work around the World Trade Center, providing care and support services to those who were injured, as well as other first responders. Ultimately, my mom was just the type of person who wanted to be there and help others as much as possible.

7. I remember learning about my mom's diagnosis upon returning from school. My mom saw me and just started sobbing uncontrollably. While she didn't specifically say that she was diagnosed with cancer, my mom was clearly in so much distress that she didn't need to. It was just readily apparent on her face. In the days that followed, we had some difficult conversations about my mom's diagnosis.

8. My mother was in a great deal of pain. I remember her declining health. Since I always leaned on her for support, she would report on how she was feeling all the time. Unfortunately, before she passed away, my mom had suffered a great deal. Despite the pain, my mom tried her best not to show it externally and worked to fight the cancer the hardest that she could.

9. After my mom was diagnosed with cancer, I was utterly devastated. My mom was my baseline for everything in my life. When she was sick, I had this realization that my mom isn't going to be here forever, and I would need to adapt to that as her condition progressed. As I was still just in my early twenties, it was also difficult because she was there for me throughout my life, and I needed to start to think about how I could support her and would have to imagine life without her.

10. When my mom was diagnosed, I became really worried about my older brother, Christopher ("Chris"), who has autism and is non-verbal. My mom was always such a strong advocate for Chris and worked as his primary caregiver. Since Chris has a significant disability,



coordinating his care is quite a challenge. My mom always connected him to the best services possible. After my mom was diagnosed, I became very concerned as to how my family and I would not only manage Chris's needs but provide the best life possible. Now that my mom is gone, still to this day, I feel that we can't even come close to how hard she tried to make sure Chris had everything he needs to be comfortable and live a full life.

11. Financially, after my mom became ill, it became very apparent that I would have to do whatever I could to be aware of the family finances. My parents were always very good about making sure my siblings and I had everything we needed and had access to a good education. However, there's definitely a realization, and especially when she passed, that I'm going to have to be independent and support myself financially.

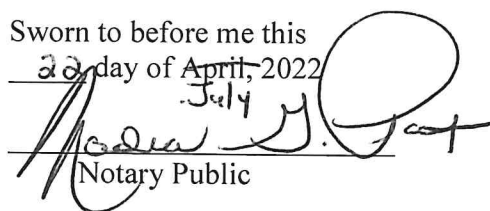
12. It's important to note that my mom was the type of person who would run headlong into danger if it meant helping anyone on the planet, no matter what the impact was going to be for her. And I think it's just a testament to my mom's character. Ultimately, it's very unfortunate that, even though she was trying to help people at the World Trade Center and to do the right thing, in the end it caused some painful and terminal health issues for her. Nevertheless, throughout her entire time dealing with cancer, my mom never threw in the towel. Despite her cancer and myriad treatments, my mom was still driven and continued to work and continued to study for her Masters' program in education. Seeing my mom handle so much all at the same time served as a personal inspiration for me. She dealt with incredible adversity and was still able to work full time, continue going to school, and support a family, which offers me perspective and makes me feel that I can overcome any obstacle that I encounter in my life.

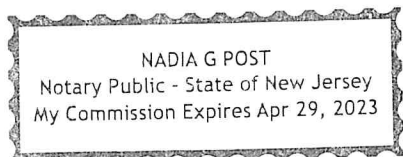
  
DANIEL PATRICK WALSH

Sworn to before me this

~~22~~ day of April, 2022

July

  
Notary Public



**David Joseph Walsh**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

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SUZANNE ANDERSON, et al,

**AFFIDAVIT OF**  
**DAVID JOSEPH WALSH**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK )

: SS.:

COUNTY OF KINGS )

DAVID JOSEPH WALSH, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 363 Ocean Parkway, Apartment D7, Brooklyn, New York 11218.
2. I am currently 30 years old, having been born on September 23, 1991.
3. I am the son of Elizabeth Ann Walsh, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My mother passed away from breast cancer on May 4, 2015, at the age of 57. It has been medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. I loved my mom and had the best relationship with her. She was my “fixed point,” the person I always went to for advice, help with managing my anxiety, and telling me everything was going to be okay. I loved spending time with her – going to the beach together, walking our family dog, hanging out whenever I was home and back from school, and just talking to her for hours on end.

6. On 9/11, my mom was a nurse and was so dedicated and loved helping people. After the terrorist attacks, she left for a few days to go into Manhattan to help victims. She was gone a lot during that time and was helping around the clock. She later told us she had taken a boat into Manhattan and had to climb up netting to get into the city since so many people were trying to get there to help. She was such a giving person, and I was very proud of her.

7. After 9/11, my mom was diagnosed with breast cancer, which later metastasized. I was so young – a junior in high school – when she was first diagnosed. I was scared for her. I remember vividly her having so many tests and biopsies. I remember her painful recovery after a 13-hour surgery to remove multiple lymph nodes and how she had trouble moving around and doing basic things. I remember how scared she was, having just lost her own sister, my godmother, to cancer a few years before. I remember she was terrified that she was going to leave us so soon. I remember my mom telling us she was going to go through all the treatments and do everything she could to survive. I did anything I could to help my family – driving my mom to and from work, walking her into and out of appointments, helping get her food, and cleaning up around the house so she could rest. She was tired all the time. I even remember that she had to get a bell to ring for assistance because she couldn’t get up and do things for herself. It was hard to watch my mom suffering and go from helping us to us helping her with basic things.

8. My mom's cancer diagnosis and death were devastating. It was a total rollercoaster of emotions. One minute, she was diagnosed with cancer and receiving treatment and things were going well so she was ecstatic about her prognosis and thought everything was going to have a happy ending. The next minute, she told us the cancer came back and had spread and things were not looking good. It was a constant up and down for years – periods of hope and remission, followed by bad news and so much pain and suffering. It was exhausting to constantly go back and forth between joy and despair and feel like bad news was always around the corner. It was hard to see my mom suffering physically and emotionally, watching her lose her hair, be so tired, and unable to do basic things for herself. I ended up going to college near my parents so I could be close by if they needed anything and could come see them regularly. I felt like I was always on high alert and worried that everything could change in an instant. In the end, my mom's cancer had progressed too far and she rapidly deteriorated. She was in a lot of pain and was lucid enough to know that things were getting worse and that she was going to die. Losing her has impacted me to this day. I suffer from depression and anxiety and have been in therapy for years trying to deal with these issues and losing my mom too soon.

9. My mom's death also had a big financial impact on my life. I had to step up and help my dad financially in a big way. I give my dad thousands of dollars each month to help pay back my student loans, taxes on the house, and other bills. Without my financial support, my dad could no longer keep up with payments, and his credit would be destroyed.

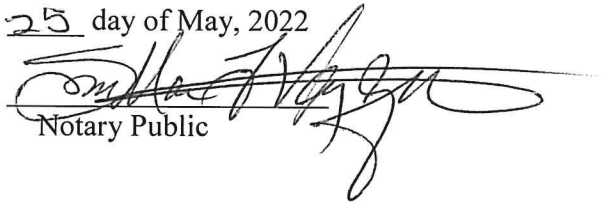
10. I am heartbroken that I will never get the time back with my mom. I will never be able to have those long chats with her and receive her good advice. I will never be able to see my whole family together again. I feel the effects of my mom's illness and death to this day, in my ongoing

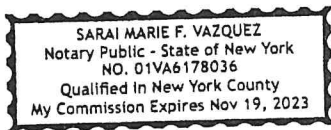


depression and anxiety and the huge financial burden that I help bear to support my family who has already lost too much.

  
\_\_\_\_\_  
DAVID JOSEPH WALSH

Sworn to before me this  
25 day of May, 2022

  
\_\_\_\_\_  
Notary Public



**Mary Walsh**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
SUZZANNE ANDERSON, et al,

**AFFIDAVIT OF**  
**MARY WALSH**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                                      : SS.:  
COUNTY OF RICHMOND    )

MARY WALSH, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 151 Hillside Avenue, Staten Island, New York 10304.
2. I am currently 34 years old, having been born on March 19, 1988.
3. I am the daughter of Elizabeth Ann Walsh, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My mother passed away from breast cancer on May 4, 2015, at the age of 57. It has been medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. I was 27 years old at the time of my mother's death.
6. I was incredibly close with my mom. She was my best friend. She was so supportive and

gave the best advice. She was very involved with my life, and we spoke almost every single day. I looked up to her both as a mom and as a person. I was in awe of how selfless she was and followed in her footsteps going into nursing. She was a wonderful role model.

7. I was a teenager at the time of 9/11, but I remember that day. As a nurse, my mom wanted to do whatever she could to help. She went down to Ground Zero with some nursing colleagues to see if she could help any of the injured or survivors.

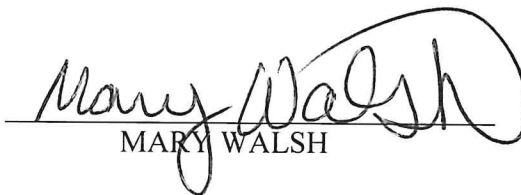
8. I will never forget when my mom got sick. She had found a lump in her breast and went to the doctor. She was diagnosed with breast cancer. I remember her telling our family about her diagnosis and trying to stay strong for us. My mother suffered so much during her cancer treatment. She had a double mastectomy and intensive chemotherapy. She was so weak and suffered with nausea, vomiting, and exhaustion. I tried to pitch in to support my mom and family and would go with her to appointments. It was hard to watch her drastic change. She went from being someone who was active and healthy and always up for helping others, to someone who was completely exhausted all the time. There was a period that she went into remission, and we all hoped that that was the end of the cancer forever. But then all of a sudden, the cancer was back and had metastasized. Things went from bad to worse. She was on all kinds of medications, which had strong side effects, and soon she was gone.

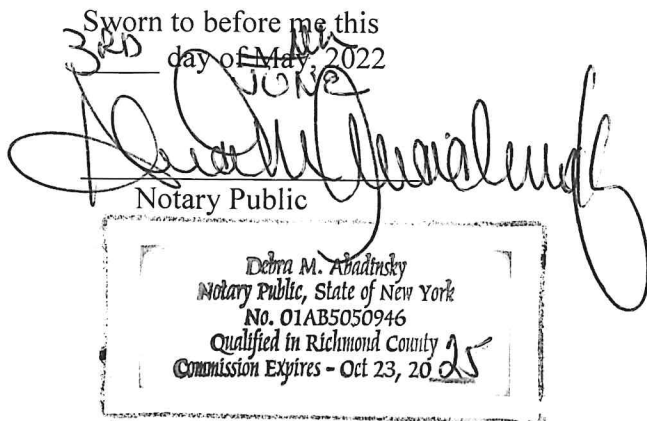
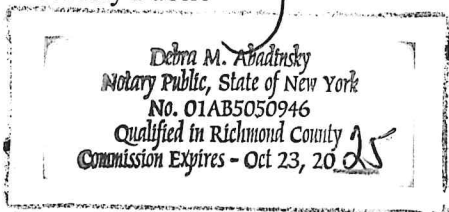
9. I struggled emotionally to cope with my mom's illness and death. I was anxious and afraid when my mom got diagnosed. I watched her become weaker and weaker and try to put on a brave face while suffering in silence. She was in agony for her last few days, but she was trying so hard to hold on because my wedding was only a few weeks away. She wanted to be there for all our big life milestones, but by the end, she was so tired. She wanted nothing more than to be at my wedding, to celebrate with family, and to meet her grandchildren. Sadly, she never got to

do any of it. She died three weeks before my wedding. It was such a bittersweet day for me. She never got to meet my two sons. She would have been the best grandmother, doting on them and playing with them. She would have loved watching them grow and helping to raise them into kind and caring young men. I still cannot cope with her death and the void it left in my life. I fell into a depression and had anxiety after she died. I had trouble sleeping and experienced horrible nightmares. I still struggle to think about all the time that we missed with my mom and how we will never get it back.

10. I felt the financial impact of my mom's death as well. She was always the first to lend a helping hand and help support me by letting me live at her home. When she passed away, that financial help was gone.

11. In the end, losing my mom at such a young age was traumatic and life changing for me. She was so young when she was diagnosed. She missed out on huge life milestones for me and my brothers. She will never know what she missed. She was in pain and tried to hold on to be with us, and it was incredibly difficult to watch her try to be strong. Her absence is felt every day by my family.

  
MARY WALSH

Sworn to before me this  
3rd day of May, 2022  
  
Notary Public  


**Richard Walsh**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

-----X  
SUZZANNE ANDERSON, et al,

**AFFIDAVIT OF  
RICHARD WALSH**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.  
-----X

STATE OF NEW YORK     )  
                                      : SS.:  
COUNTY OF RICHMOND    )

RICHARD WALSH, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 53 Bertha Place, Staten Island, New York 10301.
2. I am currently 69 years old, having been born on April 2, 1953.
3. I am the husband of Elizabeth Ann Walsh, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. Elizabeth passed away from breast cancer on May 4, 2015, at the age of 57. It has been medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. My wife and I were best friends. We met in college when we were both working at a store together. We had our first date at the Jersey Shore. We were inseparable and always had



fun. We raised five beautiful kids together. We loved taking family vacations to Florida and North Carolina and enjoyed going to concerts, plays, and spending time with our friends. Our family was always our main focus, and we loved spending quality family time together. We were a truly loving family.

6. On 9/11, Elizabeth was working as a nurse at Gardens Nursing Home in Brooklyn. As soon as she heard on the radio about a call for volunteers to help first responders, she drove back to Staten Island. She met some nursing friends and took a ferry to the World Trade Center site the same day. She met up with other medical providers at the high school across from Ground Zero. She was there when the last building fell. She told me that what she saw was devastating – injured firemen, a fire engine that was crushed by building debris, baby strollers covered in dust. She stayed for a few hours because they told her there were no survivors and there was nothing she could do. When I picked her up from the ferry, she was covered in dust and had white soot all over her body. I told her that she should throw away her clothes. I remember that she had a terrible cough for weeks after that, which eventually subsided.

7. In 2008, my wife found a lump in her breast which was diagnosed as breast cancer. She learned the cancer had spread to about 40 lymph nodes in her arm and chest. She had to have a double mastectomy. Elizabeth went through years of chemotherapy treatments. She went into remission for a few years, but the cancer came back with a vengeance and had spread to her bones. She eventually learned that the cancer had spread to her liver, which caused her to become jaundice. At this point, Elizabeth was in a lot of pain, but resisted taking her pain medications because she would become disoriented and out of it. She felt terrible and tried to power through, but every day was exhausting for her.

8. The emotional impact of my wife's illness and death was huge. I became depressed and

couldn't think straight. I know that when I was sad, it made my wife even more upset, so I felt that I had to hide my feelings and stay strong for her and the kids. I worked hard to pull it together every day. It was devastating to watch my wife slowly die. It was heartbreaking to know that my beautiful wife and the mother of my children wasn't going to be there for all the big milestones. I know she struggled to accept she wouldn't see our children get married and become a grandmother. I know in her final days she put everything she had into trying to make it to our daughter's bridal shower, but it took a lot out of her. It hurt the children to know that their mother wouldn't be alive much longer, so my son and daughter had a priest come to the house and do a blessing because Elizabeth wasn't going to make it to their approaching weddings. I worried how I was going to manage my life and the kids without her. She was an integral part of everything. I know it left a void in all our lives to lose my wife. She was a mentor to me and our family, and she wanted to be there for every milestone, birthday, wedding, and birth. It was almost unthinkable to lose someone who you have been with for nearly thirty years. My life will never be the same without her. I miss her every day.


9. The financial toll from my wife's death is ongoing. I fell into debt trying to keep on top of all our bills and continue to care for our five children. I struggle without my wife's income to help support our family. I continue to have to care for our disabled son Christopher, who has a severe seizure disorder, is non-verbal, and needs around-the-clock care. It's challenging for me to leave the house to work, or run errands, or take care of things without help since my adult son needs constant supervision. I miss my wife's guidance as a nurse in how best to care for our son.

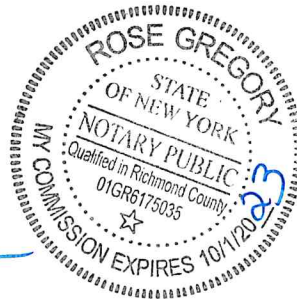


Her loss and absence will be felt by our family forever. It has left a big hole in our hearts and lives.

  
RICHARD WALSH

Sworn to before me this  
25 day of May, 2022

  
Notary Public



## **Estate of Michael Raimondi**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
SUZZANNE ANDERSON, et al,

Plaintiffs,

**AFFIDAVIT OF  
DONNA JEAN RAIMONDI**

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF CONNECTICUT)  
  : SS.:  
COUNTY OF FAIRFIELD    )

DONNA JEAN RAIMONDI, being duly sworn, deposes and says:

1. I am the plaintiff in the within action, am over 18 years of age, and reside at 22 Blueberry Hill Road, Monroe, Connecticut 06468.

2. I am currently 63 years old, having been born on April 30, 1959.

3. I am the wife of Michael Raimondi, Jr., upon whose illness my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. My husband passed away from respiratory failure on January 12, 2015. It has been medically determined that this respiratory illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. On January 7, 2016, I was appointed the personal representative of my husband's estate by the State of Connecticut Probate Court.

6. I had a great relationship with my husband. We were so compatible even though we had a fifteen-year age difference. We loved doing things together – traveling, going to the beach, and hosting friends for dinner. We valued family above all else and worked hard and went through IVF to have our two girls, Gianna and Jeanine. We loved being parents and spending time with our kids. We loved going to the beach together as a family since we had a house on the Jersey Shore. We moved to our dream home in Connecticut a few months before 9/11 and loved hosting the kids' friends and having pool parties and cookouts at our house. We wanted to give our kids the best life that we could and all the advantages we never had growing up.

7. On 9/11, my husband worked as a foreman doing a highway construction project on Brooklyn Boulevard. Following the terrorist attacks, he was called down to the World Trade Center to do search and rescue and clean up. He was one of the first people on site alongside the first responders since they needed experienced construction crews to help look for survivors underneath the rubble. He wasn't able to get in touch with us to let us know he was alive for over 24 hours. He made his way to my sister's house in the Bronx and was in total shock. He was covered in dust, debris, and dirt and had no protective equipment to shield him from it. He described in vivid detail the horror that he saw helping with search and rescue efforts including finding severed body parts. He couldn't stop talking about it. He worked around the clock and was never home, so I was left to care for our daughters by myself. He told me how the smoke didn't stop rising for a long time after 9/11 since everything was still smoldering and burning. He could never forget the sights and smells. He continued to work at the World Trade Center for over 6 months and would commute back and forth from our home in Connecticut and only be home for a few hours at a time. He carried a heavy burden based on what he saw. He became incredibly withdrawn. He kept graphic video tapes of the search and rescue that he would watch

for years and re-live the traumatic experience that he had helping rescue and identify dead bodies. He always struggled on the anniversary of 9/11 and was never the same again.

8. After 9/11, my husband started having severe health problems. He developed breathing issues almost immediately and was coughing for months on end including at night which woke me up. He had to see a pulmonary specialist for his breathing issues. He had lots of testing done at Mt. Sinai and was diagnosed with RADS and lung disease. He was prescribed strong medications to treat the lung issues, but they had major side effects. He had a heart attack and had to have a stent placed in 2006. He had so many health issues he had to go on disability and stop working. He could no longer travel or do things he used to do. It was a wakeup call and impacted his enthusiasm for life since he had such pride in his ability to work and provide for our family. He became a different man, withdrawn and depressed watching the bills mounting.

9. My husband was severely disturbed by 9/11 based on what he saw working search and rescue in the hours, days, and months after the terrorist attacks. He became obsessed with the war on terror, watching movies, news, and interviews with coverage of 9/11. He was haunted every year on the anniversary of 9/11. He would talk about the disturbing things he saw with our children even though it was not appropriate because they were so young. He became withdrawn and depressed. He was angry at the world that something so tragic could happen. He never wanted to get professional help since he was too proud and wanted to work through things on his own. I know he suffered in silence, and it weighed on me that I couldn't help him. He no longer enjoyed the things we used to enjoy together. He went from being a provider and loving husband to someone who needed help to make it through the day. We were no longer intimate because he was too ill and suffering from the side effects of his medications. We could no longer travel and relax because he was too weak and tired.

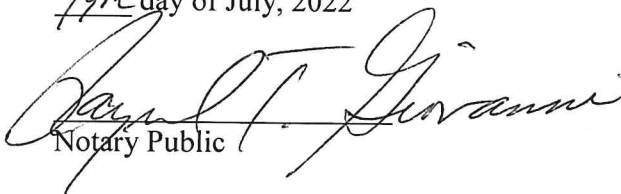


10. My husband was an incredibly hard worker and worked long hours to make a good living, give us a nice home, and save for our children's futures. He became so ill he had to stop working. He was drowning in medical bills. He could no longer make the payments on the house, and we ended up having to sell our family home. He could no longer pay tuition so my daughter, Jeanine, had to move to public school. He would be heartbroken to know how much his illness has cost us and how much we had to change about our lives as a result of his death.

11. My husband became a different man on 9/11. He went from a loving, hardworking family man to someone who was broken by the trauma of the terrorist attacks. He had trouble breathing. He had heart problems. He experienced side effects of his medications. He was in and out of the hospital. He could no longer enjoy time with our kids and travel and things he used to love. He suffered horribly after he gave so much of himself to take part in search and rescue and cleanup after 9/11.

  
DONNA JEAN RAIMONDI

Sworn to before me this  
19<sup>th</sup> day of July, 2022

  
Notary Public

**RAYMOND T. GIOVANNI**  
**NOTARY PUBLIC**  
My Commission Expires Jan. 31, 2026